

APPENDIX A

Objections to the Public Use of Microsoft Materials at Trial

Davis Decl. Ex. No.	Trial Ex. No.	Description	Requested Redaction	Basis for Sealing
1	DTX0073	Amended and Restated Display Media Services Agreement (AppNexus) – Dated Feb. 3, 2017	Microsoft requests that this exhibit be redacted in its entirety.	Information reflects confidential, non-public, and commercially sensitive contractual terms agreed to by Microsoft. Disclosure of these terms would materially impact Microsoft’s future negotiating position in efforts to secure ad tech services.
2	DTX0358	Excerpts from document titled “Risks Related to Our Business and Industry” – Dated Nov. 19, 2016	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 2.	Information reflects confidential, non-public, and commercially sensitive revenue and profit/loss values, and Xandr revenue by customer.
3	DTX0749	Email from J. Gruber to D. Pann and others attaching document titled “SAN – Native and Display Monetization” – Dated July 17, 2019	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 3.	Information reflects confidential, non-public, and commercially sensitive information on Microsoft’s business strategies, including Microsoft’s strategic approach to partnership opportunities, and internal data. Information also discloses non-public contact information for Microsoft employees.
4	DTX0827	Excerpts from Xandr document titled “SSP – Business	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 3.	Information reflects confidential, non-public, and commercially sensitive internal data on Xandr’s

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		Investment Case” – Dated Nov. 2011		actual and projected revenues, assessments of market performance, and detailed strategic and competitive plans still relevant to the ongoing business.
5	DTX0847	Excerpts from a Microsoft document titled “Why ‘Microsoft Advertising?’ What is ‘Microsoft Advertising?’ What is MSAN?” – Dated Dec. 11, 2019	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 5.	Information reflects confidential, non-public, and commercially sensitive information on the operation of Microsoft’s advertising platforms, revenues by specific customers, strategic assessments of business opportunities, and internal revenue analyses. Information also discloses non-public contact information for a Microsoft employee.
6	DTX0962	Excerpts from Xandr document titled “Future of Advertising” – Dated July 2020	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 6. Microsoft notes that the yellow highlighting in Exhibit 6 does not reflect proposed redactions. Rather that highlighting appears in the exhibit as provided to Microsoft.	Information reflects confidential, non-public, and commercially sensitive strategic planning discussions, specific methodological approaches to business decisions, , pricing strategies, detailed revenue allocations, and data figures based on internal data sources and analyses.
7	DTX0963	Excerpts from Xandr document titled “Drafted Strategy	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 7.	Information reflects confidential, non-public, and commercially sensitive strategic planning, internal

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		Materials: Monetize” – Dated July 6, 2020		assessments of competitive metrics, pricing strategies, and data figures based on internal data sources and analyses. Information also discloses non-public contact information for a Microsoft employee.
8	DTX1083	Excerpts from Xandr document titled “Ad Server Supplemental Deck” – Dated Mar. 29, 2021	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 8.	Information discloses non-public contact information for a Microsoft employee.
9	DTX1091	Excerpts from Xandr document named “Auction Mechanics, Bid Shading and SPO Overview” – Dated Apr. 23, 2021	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 9.	Information reflects confidential, non-public, and commercially sensitive descriptions of Xandr’s internal, proprietary methods of implementing features, assessments of the competitive impacts of those features, and detailed cost and revenue impacts for Xandr. Information also discloses non-public contact information for a Microsoft employee.
10	DTX1129	Excerpts from Xandr document named “Google Import Feature Guide” – Dated Aug. 19, 2021	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 10.	Information discloses a non-public email address used internally by Microsoft.
11	DTX1135	Excerpts from Xandr document titled “MSAN and Gaming: Programmatic Native & Video	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 11.	Information reflects confidential, non-public, and commercially sensitive revenue figures and projections, platform performance metrics, and

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		Advertising” – Dated Sept. 23, 2021		strategic considerations concerning ad formats.
12	DTX1142	Excerpts from Xandr document titled “Xandr Bidder Strategy Assessment” – Dated Oct. 2021	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 12.	Information reflects confidential, non-public, commercially sensitive, and detailed strategic assessments and planning for Xandr’s ad tech products, and Xandr’s plans and methods for investing and allocating resources to development projects.
13	DTX1203	Excerpts from Microsoft board presentation on Xandr acquisition – Dated Dec. 3, 2021	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 13.	Information reflects confidential, non-public, and commercially sensitive strategic considerations for the Xandr acquisition, detailed financial analyses and projections, integration planning, and undisclosed Xandr revenue figures and projections.
14	DTX1209	Excerpts from Xandr document titled “Xandr POV: TTD Open Path” – Dated Feb. 2022	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 14.	Information reflects confidential, non-public, and commercially sensitive strategic considerations for Xandr of a competitor product, including revenue and costs impacts to Xandr’s business and Xandr’s planned responses.
15	DTX1215	Excerpts from Microsoft document titled “Getting Up to Speed on Xandr” – Dated Feb. 11, 2022	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 15.	Information reflects confidential, non-public, and commercially sensitive strategic considerations for the Xandr acquisition, detailed financial analyses and projections, integration

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				planning, undisclosed Xandr revenue figures and projections, Microsoft's integration, and product launch planning. Information also discloses non-public contact information for a Microsoft employee.
16	DTX1282	Excerpts from Xandr document titled "Future of Advertising" – Dated June 2022	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 16.	Information reflects confidential, non-public, and commercially sensitive strategic planning discussions, specific methodological approaches to business decisions, , pricing strategies, detailed revenue allocations, and data figures based on internal data sources and analyses.
N/A	DTX1284	Excerpts from Ben John deposition Exhibit 25, titled "Microsoft's Considered Acquisition of DoubleClick, Acquisitions of PromoteIQ and Xandr, and Divestiture of Atlas"	Microsoft requests redactions to the following portions of the exhibit: <ul style="list-style-type: none"> • Pg. 1: "Microsoft subsequently increases estimated purchase price to [REDACTED]." • Pg. 2: <ul style="list-style-type: none"> ○ Bullets associated with the "Early 2019" section of "PromoteIQ (Acquisition)," beginning "Microsoft had..." and ending "...deemed faster." ○ "Microsoft considers...including: Xandr [REDACTED]." 	Information reflects confidential, non-public, and commercially sensitive rationales for Microsoft's acquisition strategies, including willingness to pay, and alternative acquisition possibilities.

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			<ul style="list-style-type: none"> Pg. 3: Content preceding “2021-Dec. 8/9,” beginning “eliminate...” and ending “...leadership.” 	
17	DTX1285	Excerpt from Ben John deposition Exhibit 26, titled “Microsoft Ad Tech Timeline”	Microsoft requests redactions to the excerpted page, as reflected in Exhibit 17.	Information reflects confidential, non-public, and commercially sensitive details of Microsoft’s contracts with ad tech providers and the costs to serve impressions on the Xandr platform.
18	DTX1288	Excerpts from Microsoft document, titled “Advertising as Microsoft Before June 7th 2022” – Dated June 7, 2022	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 18.	Information reflects confidential, non-public, and commercially sensitive technical details of Microsoft’s integration of Xandr, revenue synergies attributable to the acquisition, specific costs synergies, and detailed product planning and development. Information also discloses non-public contact information for a Microsoft employee.
19	DTX1289	Excerpts from Microsoft document, titled “Digital Advertising Market Sizing” – Dated June 7, 2022	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 19.	Information reflects confidential, non-public, and commercially sensitive assessments of the market opportunities in ad tech and digital advertising, including detailed projections of market growth and Microsoft’s priorities in those areas, and data figures based, in part, on internal data sources and analyses.

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20	DTX1305	Excerpts from Microsoft document, titled “Future of Advertising” – Dated June 2022	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 20.	Information reflects confidential, non-public, and commercially sensitive assessments of Xandr’s market opportunity, Xandr’s internal assessments of competitive metrics, pricing information and assessments, and data figures based on internal data sources and analyses. Information also discloses non-public contact information for a Microsoft employee.
21	DTX1337	Excerpts from Microsoft document, titled “Publisher Partner Growth FAQ” – Dated Sept. 9, 2022	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 21.	Information reflects confidential, non-public, and commercially sensitive Microsoft strategies for discussions with publishers and plans for expanding advertising opportunities. Information also discloses a non-public email address used internally by Microsoft.
22	DTX1364	Excerpts from Microsoft document, titled “Microsoft and News Corp: News Corp Partner Day” – Dated Oct. 19, 2022	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 22.	Information reflects confidential, non-public, and commercially sensitive details of Microsoft’s relationship with a customer, including revenue and revenue growth figures based on internal Microsoft data, and internal strategic thinking concerning the relationship. Information also discloses non-public

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				contact information for a Microsoft employee.
23	DTX1367	Excerpts from Microsoft document, titled “Netflix Status, ‘Halo Effects’ & CTV” – Dated Oct. 20, 2022	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 23.	Information reflects confidential, non-public, and commercially sensitive internal analysis of Microsoft’s current deal with Netflix, including non-public contract terms, and the specific business opportunities for Microsoft. Information also discloses non-public contact information for a Microsoft employee.
24	DTX1462	Excerpts from Microsoft document, titled “Matching Refresher 2023” – Dated Jan. 17, 2023	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 24.	Information discloses a non-public email address used internally by Microsoft.
25	DTX1491	Excerpts from Xandr document, titled “Questions about supply strategy” – Dated Feb. 23, 2023	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 25.	Information reflects confidential, non-public, and commercially sensitive assessments of Xandr’s supply strategy, technical details of Xandr’s ad tech integrations, and Xandr’s revenues for specific products. Information also discloses a non-public email address used internally by Microsoft.
26	DTX1524	Excerpts from Microsoft document, titled “Welcome to Microsoft Advertising” –	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 26.	Information reflects confidential, non-public, and commercially sensitive headcount and product usage details, advertiser spend on the Xandr

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		Dated Apr. 11, 2023		platforms, and internal Microsoft revenue data. Information also discloses a non-public email address used internally by Microsoft.
27	DTX1840	Figure 19: Microsoft Audience Network U.S. Spending, Apr 2020-Dec 2022	Microsoft requests redactions to Figure 19, as reflected in Exhibit 27.	Detailed figures reflecting confidential, non-public, and commercially sensitive data on the distribution of advertiser spend on the Microsoft Audience Network.
28	DTX1958	Figure 145: Xandr Monetize (Exchange) U.S. Indirect Display Spending by Environment, 2019-2022	Microsoft requests redactions to Figure 145, as reflected in Exhibit 28.	Detailed figures reflecting confidential, non-public, and commercially sensitive data on the distribution of advertiser spend on the Xandr Monetize service.
N/A	DTX2227 DTX2228 DTX2229 DTX2230 DTX2231 DTX2232	Transaction data produced by Microsoft	Microsoft requests that the underlying data files, and any information drawn therefrom, remain sealed in their entirety. Due to the nature and size of the data files, which span over hundreds of individual data files, it is not possible to file redacted versions.	Information reflects confidential, non-public, commercially sensitive, and extensively detailed transaction-level data for Microsoft's and Xandr's advertising products and services. These exhibits encompass gigabytes of data, stretching over hundreds of individual files, and including years of sensitive, granular, customer-specific monthly data (e.g., specific revenues, impressions, fees, and geographic distributions thereof).

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N/A	N/A	Transaction data produced by Microsoft	<p>Plaintiffs noticed Microsoft of eight data files from which Plaintiffs intend to present exhibits based on the underlying data.</p> <ul style="list-style-type: none"> • MSFT-AGG-LIT-00000007.002 • MSFT-AGG-LIT-00000007.003 • MSFT-LIT-0000053397 • MSFT-LIT-0000060007 • MSFT-LIT-0000073226 • MSFT-LIT-0000073226 • Request1_201910 • Request3_202205 <p>Microsoft requests that the underlying data files, and any information drawn therefrom, remain sealed in their entirety.</p> <p>Due to the nature and size of the data files, which span over hundreds of individual data files, it is not possible to file redacted versions.</p>	Information reflects confidential, non-public, commercially sensitive, and extensively detailed transaction-level data for Microsoft's and Xandr's advertising products and services. These exhibits encompass gigabytes of data, stretching over hundreds of individual files, and including years of sensitive, granular, customer-specific monthly data (e.g., specific revenues, impressions, fees, and geographic distributions thereof).
29	PTX1603	Excerpts from Xandr document, titled "2019 Publisher Tools Direct Supply" – Dated Dec. 13, 2018	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 29.	Information reflects confidential, non-public, and commercially sensitive strategic planning details, estimated and actual financial figures, detailed product investment plans, and data figures based on internal data sources and analyses.
30	PTX1626	Excerpts from Xandr submission to French Competition Authority –	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 30.	Information reflects confidential, non-public, and commercially sensitive revenue, impression, and usage data.

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		Dated Oct. 29, 2019		
31	PTX1628	Excerpts from Xandr documents titled “DSP Investment Strategy” and “SSP Business Investment Case” – Dated Nov. 14, 2019	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 31.	Information reflects confidential, non-public, and commercially sensitive internal data on Xandr's actual and projected revenues, assessments of market performance, the geographic distribution of Xandr's revenue, assessments of Xandr's competitors, and detailed strategic plans still relevant to the ongoing business.
32	PTX1644	Excerpts from Xandr submission to French Competition Authority – Dated May 27, 2020	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 32.	Information reflects confidential, non-public, and commercially sensitive revenue data.
33	PTX1649	Excerpts from Xandr document titled “Product & Platform Strategy” – Dated July 27, 2020	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 33.	Information reflects confidential, non-public, and commercially sensitive details of Xandr's product development strategies, investment and workstreams required to implement those strategies, and the competitive impact of executing those strategies.
34	PTX1659	Excerpts from Microsoft document titled “Getting Up to Speed on Xandr”	Microsoft requests redactions to the excerpted pages, as reflected in Exhibit 34.	Information reflects confidential, non-public, and commercially sensitive strategic considerations for the Xandr acquisition,

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		– Dated Feb. 11, 2022		detailed financial analyses and projections, integration planning, undisclosed Xandr revenue figures and projections, Microsoft’s integration, and product launch planning. Information also discloses non-public contact information for a Microsoft employee.
N/A	N/A	Transcript designations to the deposition testimony of Benneaser John	<p>Microsoft objects to the public use of the following portions of the transcript:</p> <ul style="list-style-type: none"> • Tr. 33:17-18 (“...has grown from [REDACTED] in two years.”) • Tr. 109:10-11 • Tr. 109:22-23 (“[REDACTED] are all reaching...”) • Tr. 160:22-161:9 • Tr. 161:12-16 • Tr. 161:18-162:7 • Tr. 162:11-23 • Tr. 162:25-164:9 • Tr. 168:9-12 (“I believe it’s [REDACTED] Q. [REDACTED]? A. [REDACTED] in Europe...”) • Tr. 186:17-18 (“What’s your understanding of why [REDACTED] switched...”) • Tr. 181:14-16 • Tr. 246:13-247:7 	Information reflects confidential, non-public, and commercially sensitive revenue figures, customer outreach, Microsoft’s opportunities for particular customers, and the technical operation of Microsoft’s mediation and bid shading features.
N/A	N/A	Transcript designations to the deposition	Microsoft objects to the public use of the following portions of the transcript:	Information reflects confidential, non-public, and commercially sensitive take rates, technical

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		testimony of Brian O'Kelley	<ul style="list-style-type: none"> • Tr. 165:24-166:5 (“I think that we started out at [REDACTED] percent in 2007...to around [REDACTED] percent, as sort of a baseline.”) • Tr. 166:10-11 (“But I think we were always in that [REDACTED] percentage range.”) • Tr. 170:10-14 (“So AppNexus, when I left, had [REDACTED] cores...And that was maybe [REDACTED] million a year...”) • Tr. 173:22-174:5 (“...if you take that [REDACTED] million we were investing...maybe we’d make [REDACTED] million. If we won...we’d make [REDACTED] million...”) • Tr. 201:1-17 • Tr. 202:2-18 	capabilities, business costs, estimated revenues based on business costs, and contractual terms between Microsoft and Xandr.